

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SARAH PALIN, an individual,

Plaintiff,

– against –

THE NEW YORK TIMES COMPANY,
a New York corporation,

Defendant.

No. 17 Civ. 4853

Hon. Jed S. Rakoff

ECF Case

DECLARATION OF SHANE B. VOGT

SHANE B. VOGT, pursuant to 28 U.S.C. § 1746, hereby declares and says:

1. I am an attorney licensed to practice law in the State of Florida, specially admitted to practice in this Court [Doc. 13] and a partner in the law firm of Bajo Cuva Cohen Turkel, P.A., counsel of record for plaintiff in the above-captioned matter, Sarah Palin.

2. I submit this Declaration in opposition to the motion to dismiss Mrs. Palin's Complaint made by defendant, The New York Times Company ("*The Times*").

3. Attached hereto as **Exhibit A** is a true and correct copy of *The Times*' Editorial Web page, which can be found at <http://www.nytimes.com/interactive/opinion/editorialboard.html>.

4. Attached hereto as **Exhibit B** is a true and correct copy of a highlighted version of Exhibit 3 to the Plaintiff's Complaint.

5. Attached hereto as **Exhibit C** is a true and correct copy of *The Times*' article "*Systemic Change Needed After Faulty Times Article*," which can be found at <http://publiceditor.blogs.nytimes.com/2015/12/18/new-york-times-san-bernardino-correction-margaret-sullivan-public-editor>.

6. Attached hereto as **Exhibit D** is a true and correct copy of *The Times*' article "*The Public Editor Signs Off*," which can be found at <http://www.nytimes.com/2017/06/02/public-editor/liz-spaid-final-public-editor-column.html>.

7. Attached hereto as **Exhibit E** is a true and correct copy of a printout of the results of a query for "Jared Lee Loughner" on *The Times*' website, which can be found at <http://www.nytimes.com/topic/person/jared-lee-loughner>.

EXECUTED on July 21, 2017.



Shane B. Vogt